

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA  
Plaintiff,

v.

ROLANDO SIERRA-VELAZQUEZ (2)  
Defendant.

Criminal no. 18-603 (GAG)

**EMERGENCY MOTION REQUESTING MEDICAL RECORDS FROM MDC**

**TO THE HONORABLE COURT:**

Comes now the defendant, Mr. Sierra-Velazquez, and respectfully states and prays as follows:

Mr. Sierra-Velazquez is currently detained at MDC Guaynabo pending the resolution of his case.

1. On January 5, 2021, and on again in April 2021, Mr. Rolando Sierra-Velázquez has requested the assistance of the Court requesting an Order to secure Medical Records from MDC Guaynabo. (*See* Docket #s 68, 69)
2. In the past weeks, Mr. Sierra-Velazquez has once again been transported to a local hospital and an emergency surgery was performed to address his medical conditions, which continue to be improperly addressed at MDC.
3. It is believed that this is the third emergency surgery that he has endured in the past 6 months. Unfortunately, the undersigned has had little interaction with Mr. Sierra-Velázquez because he has either been housed at the local hospital or upon his return from said hospitalizations, at MDC's quarantine unit, many times for extended periods.
4. As informed by his family members, Mr. Sierra-Velázquez was advised that if his diet plan is not instituted forthwith, he will suffer permanent organ damage, and his life is also in danger.

5. Upon learning of this situation, the undersigned contacted MDC Legal to convey the gravity of the situation and the need to ensure that Mr. Sierra Velazquez's diet is implemented immediately.
6. MDC Legal informed the undersigned that it would relay the information to the Medical Unit, and in a later communication, it notified that all efforts to ensure that Mr. Sierra Velazquez's diet needs were being implemented. Nevertheless, no timeline for this was provided, and no assurances were made upon request by counsel.
7. It is imperative that the undersigned has access to the medical records requested as they are crucial in assisting Mr. Sierra Velázquez's mitigation information necessary for plea negotiations, and sentencing.

WHEREFORE, the undersigned respectfully requests that the Court takes note of the present motion and ORDER MDC personnel to provide the undersigned with the requested medical records.

**RECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, this 3<sup>rd</sup> day of June 2021.

**I HEREBY CERTIFY**, that on this date the present document has been filed electronically and is available for viewing and downloading from the Court's CFM/ECF system by U.S. Attorney's Office.

s/ Diego H. Alcalá Laboy  
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